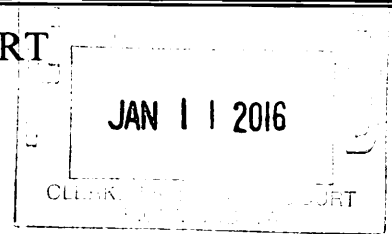


AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the  
Eastern District of Virginia



United States of America

v.

Javanta F. Lightfoot

Case No.

3:16-MJ-

116

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 27, 2015 in the county of New Kent in the  
Eastern District of Virginia, the defendant(s) violated:

Code Section

Title 18, United States Code,  
Sections 2119 and 2;

Offense Description

Carjacking

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Complainant's signature

John D. Dunham, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

January 11, 2016

/s/

David J. Novak

United States Magistrate Judge

Judge's signature

City and state:

Richmond, VA

Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, John D. Dunham, being first duly sworn, hereby depose and state as follows:

**I. Affiants Background and Experience**

1. Your affiant is a law enforcement officer within the meaning of Title 18, United States Code, Section 2510(7), that is an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516.

2. I have over ten years of law enforcement experience stemming from employment as a Special Agent with the Air Force Office of Special Investigations beginning in May 2004 to my present assignment with the Federal Bureau of Investigation (FBI). Currently, I am a duly appointed Special Agent of the FBI and have been employed as such since October 2005. I am assigned to the Richmond FBI's Central Virginia Violent Crimes Task Force and my duties include investigating bank robberies, armored car robberies, extraterritorial offenses, kidnappings, armed carjackings and theft of government property. I have investigated numerous criminal violations and have obtained arrest and search warrants.

3. I have personally participated in the investigation set forth below. The crimes I investigate are violent and usually involve two or more individuals and I am familiar with the methods the violent offender use to conduct their illegal activities to include their communication methods.

4. I am familiar with the facts and circumstances of the investigation through my personal participation; from discussions with other agents of the FBI and other law enforcement agencies; from my discussions with witnesses involved in the investigation; and from my review of records and reports relating to the investigation. Unless otherwise noted, wherever in this

affidavit I assert that a statement was made, the information was provided by another FBI agent, law enforcement officer or witness who may have had either direct or hearsay knowledge of that statement and to whom I or others have spoken or whose reports I have read and reviewed. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for a criminal complaint the requested warrant and does not set forth all of my knowledge about this matter.

5. I am aware that Title 18 of the United States Code, Section 2119, makes it a crime for any person with the intent to cause death or serious bodily harm takes a motor vehicle that has been transported, shipped, or received in interstate or foreign commerce from the person or presence of another by force and violence or by intimidation.

6. Having so said, I make this affidavit in support of a criminal complaint charging:

- Colin Ray Dugger ("DUGGER" herein), with one count of armed carjacking in violation of 18 USC §§ 2119 and 2.
- David Dewayne Jackson ("JACKSON" herein), with one count of armed carjacking in violation of 18 USC §§ 2119 and 2.
- Anthony Tyrone Williams, Jr ("WILLIAMS" herein), with one count of armed carjacking in violation of 18 USC §§ 2119 and 2.
- Javanta F. Lightfoot ("LIGHTFOOT" herein), with one count of armed carjacking in violation of 18 USC §§ 2119 and 2.

7. Because this affidavit is being submitted for the limited purpose of securing arrest warrants, I have not included each and every fact known to me concerning this investigation. I have set forth facts that I believe are necessary to charge DUGGER, JACKSON, WILLIAMS, and LIGHTFOOT with the criminal conduct set forth herein.

## II. FACTS

8. The United States is investigating an armed carjacking of an individual in New Kent County, Virginia. On November 27, 2015 around 6:30am, The victim, ("Victim" herein) who is a 61 year old female was traveling on Interstate 64 heading westbound in New Kent County with her destination being her daughter's residence in the Brickshire neighborhood of New Kent County.

9. VICTIM was driving a 2013 Lincoln SUV, white in color valued at over \$25,000 that is registered to VICTIM and her husband (hereinafter referred to as "STOLEN VEHICLE").

10. VICTIM noticed that a vehicle, described as a red in color four door vehicle with smoked out tail lights, (hereinafter referred to as "SUSPECT VEHICLE") appeared to be following her once she got off the interstate and into the subdivision.

11. When VICTIM made it to her final destination, she pulled into the driveway and the SUSPECT VEHICLE, pulled into the driveway next to her. Subsequently, she was approached by two black males, one of them having a handgun. The two black males demanded that VICTIM provide the keys to the stolen vehicle as one of the males pointed the handgun at VICTIM. Additionally, the two suspects demanded VICTIM get out of the STOLEN VEHICLE, and when she did they both got into the STOLEN VEHICLE and drove away in the STOLEN VEHICLE. The SUSPECT VEHICLE drove away at the same time that the suspects pulled away in the STOLEN VEHICLE.

12. Emergency Communications (911) was contacted and the information was relayed to law enforcement officials.

13. Subsequently, both the STOLEN VEHICLE and the SUSPECT VEHICLE were spotted traveling together in New Kent County approximately 10 minutes after the suspects confronted VICTIM.

14. Virginia State Police Troopers attempted to perform a traffic stop on the STOLEN VEHICLE but the vehicle failed to stop, resulting in a high speed chase into Charles City County. The STOLEN VEHICLE was later stopped and the two suspects fled on foot and eventually detained. The driver of the STOLEN VEHICLE was LIGHTFOOT and the front passenger was JACKSON. Also located in the victim's vehicle was a loaded Hi-Point .40 caliber semi-automatic handgun that is registered to DUGGER.

15. Law enforcement performed a traffic stop on the SUSPECT VEHICLE in Charles City County, VA without incident and the occupants were detained. The driver of the SUSPECT VEHICLE was DUGGER and the front passenger was WILLIAMS.

16. After detaining each suspect, law enforcement read each suspect their rights pursuant to Miranda and each signed waiver forms, agreeing to speak to law enforcement. All four suspects confessed to the crime of carjacking and implicated themselves and the others during this incident. JACKSON admitted to being the suspect with the firearm during the robbery of VICTIM. WILLIAMS admitted to being with JACKSON when they approached VICTIM to rob her and then drove VICTIM's vehicle after the initial carjacking. DUGGER admitted that the suspects drove around together discussing doing a "lick"—a robbery, and admitted to being the driver of the first vehicle and then assisting with the getaway. DUGGER also admitted that the Hi-Point .40 caliber handgun belonged to him. LIGHTFOOT admitted that the suspects drove around together discussing doing a "lick," specifically looking for a car to

steal, and that he was in the vehicle with DUGGER. LIGHTFOOT also admitted that after the carjacking, he got into the STOLEN VEHICLE.

17. From statements that the offenders made following their arrests, it appears that the four suspects conspired with each other and had supporting roles during the act of armed carjacking.

18. JACKSON is a convicted felon with prior felony convictions to include burglary and possession of a firearm by a convicted felon.

19. The STOLEN VEHICLE has been transported, shipped, or received in interstate commerce.

### **III. CONCLUSION**


20. Based on the aforementioned factual information, I respectfully submit that there is probable cause to charge Colin Ray DUGGER, David Dewayne JACKSON, Anthony Tyrone WILLIAMS, Jr, and Javanta F. LIGHTFOOT, with one count of armed carjacking in violation of 18 USC §§ 2119 and 2.

Respectfully Submitted,



John D. Dunham, Special Agent  
Federal Bureau of Investigation

SUBSCRIBED and SWORN before me this 11th of January 2016

IS/   
David J. Novak  
United States Magistrate Judge

DAVID J. NOVAK  
UNITED STATES MAGISTRATE JUDGE